

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SUMMIT 6 LLC,

Plaintiff,

V.

**RESEARCH IN MOTION CORP.,
et. al.**

Defendants.

CIVIL ACTION NO. 3:11-cv-00367-O

JURY TRIAL DEMANDED

SUMMIT 6'S MOTION FOR A COMPULSORY ROYALTY

Plaintiff Summit 6 LLC (“Summit 6”) requests that the Court award an ongoing compulsory royalty for patent infringement for accused devices sold by Samsung post-verdict. As explained in the attached brief, such relief is necessary to compensate Summit 6 for Samsung’s continued infringement.

DATED: April 12, 2013

Respectfully submitted,

McKOOL SMITH, P.C.

s/ *Theodore Stevenson III*

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**ATTORNEYS FOR PLAINTIFF
SUMMIT 6 LLC**

CERTIFICATE OF CONFERENCE

On April 10, 2013 and April 11, 2013, Mr. Stevenson conferred with Mr. Nelson, attorney for Samsung, regarding the relief sought in this Motion. Samsung indicated that it is opposed to the relief requested in this Motion.

/s/ Theodore Stevenson III
Theodore Stevenson III

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on counsel for Defendants through this Court's ECF system by electronic mail on this 12th day of April, 2013.

/s/ Mitchell R. Sibley
Mitchell R. Sibley